

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 27, 2001

Edward Grieb, Treasurer Action Fund of Lehman Brothers Holdings Inc. 200 Vesey Street, 11th Floor New York, NY 10285

Identification Number: C00127670

Reference: April Monthly Report (3/1/01-3/31/01)

Dear Mr. Grieb:

This letter is to inform you that as of December 26, 2001, the Commission has not received your response to our request for additional information, dated December 5, 2001. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

An adequate response must be received at the Commission by January 16, 2002. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter, please contact Alice Kang on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

John D. Gibson

Assistant Staff Director Reports Analysis Division



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Identification Number:

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Reference:

April Monthly Report (3/1/01-3/31/01)

Dear Mr. Grieb:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion(s) attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a multicandidate committee and its affiliates from making a contribution to a national political party in excess of \$15,000 in a calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an excessive contribution, you must notify the recipient and request a refund of the amount in excess of \$15,000. The refund of the excessive amount must be made within sixty (60) days of receipt-of-the contribution.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received.

Although the Commission may take further legal action concerning the

excessive contribution(s), prompt action in obtaining a refund will be taken into consideration.

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

Alice Kang

Reports Analyst

Report Analysis Division

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SCHEDULE B	ITEMIZED DIS			e schedude(s)	25 / 26					
				mmary Page	FOR LINE NUMBER 23					
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.										
NAME OF COMMITTEE (In Full) Action Fund of Lehman Brothers Holdings Inc.										
Full Name, Mailing Address, and ZSP (Code	Purpose of Disbursement		Date (month.	Amount of Each Disbursement This					
Enzi for US Senate		Contribution made to Non-affil-		day, year)	Perxod					
		iated {Senate - Y/Y - }		03/07/2001	1800.00					
P.O. Box 2775		Disburgement for: X Primary	General							
Cody WY 8	2414	Other (specify) :								
Full Name, Mailing Address, and ZP (Code	Purpose of Digbursement	i	Date (month,	Amount of Each Disbursement This					
Nati Rep San Critia (NRSC)		Contribution made to Non-affil- lated		day, year) 03/12/2001	Period 15000.00					
and no and 64 ME		(-DC-)		Q\$12/2001	13000.00					
425 Second St. NE		Diabursement for: Primary	General							
Washington DC 20	0002	X Other (specify): Not Applicable	-		Amount of Each					
Full Name, Mailing Address, and ZIP (Cade	Purpose of Disbursement		Date (month, day, year)	Clabursement This					
Friends of Carolyn McCarthy		Contribution made to Non-affili- iated	- !	03/12/2001	Period 1000:00					
151 Linden R¢.		(House - NY - 4)	 ;	U3/12/2001	100000					
		Disbursement for: X Primary	General							
Minerals NY 1	1501	Other (specify):		Date (month.	Amount of Each					
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Wilmington DE 1	9899	Other (specify):			Name of Carlo					
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		(House - NY - 12)		V\$(122001	100000					
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\$liver Spring MD 2	20904	Other (specify):	-	Data danasih	Amount of Each					
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Anna Estrao for Congress		Contribution made to Non-affil- listed		03/14/2001	500.0D					
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1		Disbursement for: X Primary	General							
Secremento CA (<u> </u>	Other (specify) : Purpose of Disbursement	- 	Date (month,	Amount of Each					
Full Name, Mailing Address, and ZIP	Code	Contribution made to Non-affil-		day, year)	Disbursement This Period					
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P.O. Box 1859		(Senate - SD -) Disburgement for: X Primary	General							
Different mile	57101	Other (specify):		Date (month,	Amount of Each					
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Friends of Phili Gramm		isted	İ	03/27/2001	1000.00					
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Da Xas TX	75380	Other (specify):	 +	Clabs / sale	Amount of Each					
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Le moditals series		Disburgement for: X Primary	Ueneral	l	1					

Disbursement for: X Primary General

21500.00

Other (specify) :

SUBTOTALS of Disbursements This Page (Optional)

TOTALS This Period (last page this line number only)

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AS OF	incomercial purposes, other than un NAME OF COMMITTEE (In Full) Peabody Political Action Commit	aing the name and addrass of any police	cal committee to	solicit contributions from such committee		
A	Full Name (Last, First, Middle Initial) National Republican Senatorial (Malling Address Ronald Reagan Republican Cen			Date of Diabursement 03 06 2001		
	City Weshington Purpose of Disbursement	State Zip Code DC 20002	<u>-</u>	Amount of Each Disbursement this Period 5000.00		
1	2001 Nati. Party Crote-Federal Acct. Candidate Name REPUBLICAN PARTY OF KEN' Office Sought: House	· -	Catagory Type			
L	Senate President State: District:			Transaction ID: 9B23.10914		
В.	Full Name (Last, First, Middle Initial) NELSON 2000 Mailing Address			Date of Disbursoment 0.3 0.6 2001		
	1915 N. 121st Street City OMAHA	SUITE B State Zip Code NE 68154		Amount of Each Disbursement this Period		
	Purpose of Disbursement Contribution - General Debt Retirem Candidate Name	ant	Category/ Type			
	Office Sought: House × Senate President	Disbursament For: Primary General X Other (specify) ▼ Other		Transaction ID: SB23.10912		
C.	State: NE District: 90 Full Name (Last, First, Middle Initial) REPUBLICAN PARTY OF KEN)		Date of Disbursement		
	Mailing Address PO 80X 1088 City FRANKFORT	State Zip Code KY 40602		Amount of Each Diabursement this Peri		
	Purpose of Disbursement 3/31/01 Event Candidate Name		Category/ Type			
	Office Sought: House Senate President State: District:	Disbursement For: Primary General ¡X Other (specify) ▼ Other	i	Transaction ID: SB23.10919		

FEC Schedule B

(Revised 1/2001)

SUBTOTAL of Disbursements Trils Page (optional)

TOTAL This Period (last page this line number only)

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